

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

VICTOR GILMORE

Plaintiff,

v.

Civil No.: 2:18cv634

TARIQ K. LOUKA, ESQUIRE

And

RESULTS UNLIMITED, INC.

And

EMERALD POINT APARTMENTS

Defendants.

MOTION TO QUASH SERVICE OF PROCESS AND TO DISMISS

COMES NOW, Emerald Point, LLC, by counsel, and specially appears and moves the Court pursuant to Rules 12(b)(4) and (5) to quash the service of process made on its Registered Agent and to dismiss the Complaint for lack of proper service and personal Jurisdiction as set forth in the accompanying memorandum of law.

NOTICE TO PRO SE PLAINTIFF:

In accordance with *Roseboro v. Garrison*, 528 F.2d 309 (4th Cir. 1975), take notice and be warned that a motion dispositive of this action has been filed. As such:

(1) The pro se party is entitled to file a response opposing the motion and that any such response must be filed within twenty-one (21) days of the date on which the dispositive or partially dispositive motion is filed; and

(2) The Court could dismiss the action on the basis of the moving party's papers if the pro se party does not file a response; and

(3) The pro se party must identify all facts stated by the moving party with which the pro se party disagrees and must set forth the pro se party's version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and

(4) The pro se party is also entitled to file a legal brief in opposition to the one filed by the moving party.

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of March, 2019, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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